

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

QWEST COMMUNICATIONS
INTERNATIONAL, INC.,

Plaintiff,

v.

CONQWEST, INC.,

Defendant.

Civil Action No. 04-cv-11878 RCL

DECLARATION OF CHRISTINE SEARLS

1. My name is Christine Searls. I am a member of the Bar of the State of Colorado. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. I am in-house counsel to plaintiff Qwest Communications International, Inc. (“Qwest”).

3. Qwest regularly maintains employee records in the ordinary course of its business. These records include each employee’s home address and work location. Qwest’s employee records are updated at or near the time a new employee is hired, and at or near the time an employee moves.

4. According to Qwest’s employee records, Gary Waldner lives in Highlands Ranch, Colorado and works in Denver, Colorado.

5. According to Qwest’s employee records, Adam Rennert lives and works in Denver, Colorado.

6. According to Qwest’s employee records, Kelly Moravek lives in Long Pond, Pennsylvania and works in Florham Park, New Jersey.

7. According to Qwest’s employee records, Douglas Kerry lives in Nederland, Colorado and works in Denver, Colorado.

8. According to Qwest's employee records, Richard Duffy lives in Littleton, Colorado and works in Denver, Colorado.

9. According to Qwest's employee records, Donald Derisi lives in Pearl River, New York and works in Florham Park, New Jersey.

10. I live in Golden, Colorado and work in Denver, Colorado.

11. None of these individuals lives or works in Massachusetts, or within 100 miles of Boston, Massachusetts.

12. None of these individuals is a party to this action, nor is any of these individuals a principal, officer, or managing agent of a party to this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed at Denver, Colorado, this 10th day of February, 2006.

/s/ Christine Searls
Christine Searls